

STEVEN S. ALM
United States Attorney
District of Hawaii

ELLIOT ENOKI
First Assistant U.S. Attorney

FLORENCE T. NAKAKUNI
Assistant U.S. Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850

Attorneys for Plaintiff
UNITED STATES OF AMERICA

ORIGINAL
FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 22 2001
2 26
at 2 o'clock and 26 min. M.
WALTER A.Y.H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

| | | |
|---------------------------|--------|------------------------------|
| UNITED STATES OF AMERICA, |) | CR. NO. 00-00472 DAE |
| |) | |
| Plaintiff, |) | SUPERSEDING INDICTMENT |
| |) | [18 U.S.C. §§ 1955, 2 & 1952 |
| vs. |) | and 28 U.S.C. § 2461] |
| |) | |
| PO KWONG LI, | (01)) | |
| aka "Simon," |) | |
| aka "Simon Abu," |) | |
| KAI SANG LAU, | (02)) | |
| ENG HOCK NG, | (03)) | |
| |) | |
| Defendants. |) | |

SUPERSEDING INDICTMENT

COUNT 1

The Grand Jury charges that:

From a time unknown but prior to January, 1996, and continuing to on or about sometime in late January or February, 1997, in the District of Hawaii, defendants PO KWONG LI, aka "Simon," aka "Simon Abu," KAI SANG LAU, and ENG HOCK NG,

unlawfully, willfully and knowingly did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, said illegal gambling business involving card and dice games in violation of the laws of the State of Hawaii (Hawaii Revised Statute § 712-1221), in which said business was conducted; which illegal gambling business involved, during the period aforesaid, five or more persons who conducted, financed, managed, supervised, directed and owned all or a part thereof; and which gambling business remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue in excess of \$2,000 in a single day.

All in violation of Title 18, United States Code, Section 1955, and Title 18, United States Code, Section 2.

COUNT 2

The Grand Jury further charges that:

On or about January 5, 1996, in the District of Hawaii and elsewhere, defendants PO KWONG LI aka "Simon," aka "Simon Abu," and KAI SANG LAU, unlawfully, willfully, and knowingly used, and caused the use of, a facility in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving gambling in violation of the laws of the State of Hawaii, and thereafter defendant, PO KWONG LI aka "Simon," aka "Simon Abu," and KAI SANG LAU, did perform and attempt to perform acts to promote, manage, establish, carry on,

and facilitate the promotion, management, establishment, and carrying on of the illegal gambling business.

All in violation of Title 18 United States Code, Sections 1952 and 2.

COUNT 3

The Grand Jury further charges that:

On or about June 5, 1996, in the District of Hawaii and elsewhere, defendants PO KWONG LI aka "Simon," aka "Simon Abu," KAI SANG LAU, and ENG HOCK NG, unlawfully, willfully, and knowingly used, and caused the use of, a facility in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving gambling in violation of the laws of the State of Hawaii, and thereafter defendants, PO KWONG LI aka "Simon," aka "Simon Abu," and KAI SANG LAU, ^{and ENG HOCK NG} did perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the illegal gambling business.

All in violation of Title 18 United States Code, Sections 1952 and 2.

COUNT 4

The Grand Jury further charges that:

On or about September 8, 1996, in the District of Hawaii and elsewhere, the defendants, PO KWONG LI, KAI SANG LAU, and ENG HOCK NG, did unlawfully, willfully, and knowingly caused

another person to travel in foreign commerce from Hawaii to Hong Kong, with the intent to distribute the proceeds of an unlawful activity, said unlawful activity being a business enterprise involving gambling in violation of the laws of the State of Hawaii, and thereafter did perform and attempt to perform acts to distribute the proceeds of said unlawful activity.

All in violation of Title 18 United States Code, Sections 1952 and 2.

COUNT 5

The Grand Jury further charges:

A. Upon conviction of the offense alleged in Count 1 of this Indictment, defendant PO KWONG LI used the following U.S. Currency which constituted the proceeds from the offense:

\$177,000

If any of the above-described forfeitable property, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred to or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty;


It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

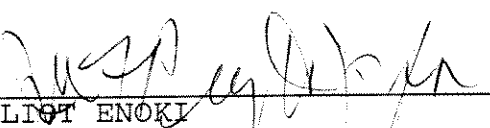
All in violation of Title 28, United States Code, Section 2461 and Title 18 United States Code, Section 1955.


DATED: February 22, 2001, Honolulu, Hawaii.

A TRUE BILL

151
FOREPERSON, Grand Jury


STEVEN S. ALM
United States Attorney


ELLIOT ENOKI
First Assistant U.S. Attorney


FLORENCE T. NAKAKUNI
Assistant U.S. Attorney

USA v. Po Kwong Li, et al.
Cr. No. 00-00472 DAE
"Superseding Indictment"